

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:22-cv-828

FEDERAL TRADE COMMISSION,
STATE OF CALIFORNIA, STATE OF
COLORADO, STATE OF ILLINOIS,
STATE OF INDIANA, STATE OF IOWA,
STATE OF MINNESOTA, STATE OF
NEBRASKA, STATE OF OREGON,
STATE OF TENNESSEE, STATE OF
TEXAS, STATE OF WASHINGTON, and
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION, LLC,
and

CORTEVA, INC.,

Defendants.

**SYNGENTA'S CONSENT
MOTION FOR EXTENSION
OF TIME**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC ("Syngenta Defendants"), move the Court for an order extending their time to file a Response to Plaintiffs' Motion to Compel Discovery of Syngenta Defendants, through and including July 16, 2024. In support of their motion, and as good cause and with the consent of Plaintiffs, Syngenta Defendants show the Court the following:

1. On June 25, 2024, Plaintiffs filed a Motion to Compel Discovery of Syngenta Defendants [Dkt. 217], making the Syngenta Defendants' response due on or before July 9, 2024.

2. On June 27, counsel for the Syngenta Defendants conferred with counsel for Plaintiffs and Plaintiffs consent to the requested extension of time for the Syngenta Defendants to file a response to Plaintiffs' Motion to Compel Discovery of Syngenta Defendants of seven (7) days, through and including July 16, 2024.

3. Syngenta has agreed to consent to a reciprocal extension of time of seven (7) days for Plaintiffs' reply brief, should Plaintiffs seek such an extension.

4. The time for responding has not expired, and this motion is made in good faith and not for the purpose of delay.

WHEREFORE, Defendants Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC, respectfully request that the Court enter an order extending their deadline to file a response to Plaintiffs' Motion to Compel Discovery of Syngenta Defendants through and including July 16, 2024.

This the 1st day of July 2024.

s/Patrick M. Kane

Patrick M. Kane

N.C. Bar No. 36861

pkane@foxrothschild.com

FOX ROTHSCILD LLP

230 N. Elm Street, Suite 1200

PO Box 21927 (27420)

Greensboro, NC 27401

Telephone: 336.378.5200

Facsimile: 336.378.5400

Paul S. Mishkin*

paul.mishkin@davispolk.com

James I. McClammy*

james.mcclammy@davispolk.com

Charles S. Duggan*

charles.duggan@davispolk.com

David Brendan Toscano*

david.toscano@davispolk.com

Daniel J. Thomson*

daniel.thomson@davispolk.com

450 Lexington Avenue

New York, New York 10017

Telephone: 212.450.4292

Facsimile: 212.701.5292

*Specially appearing under L.R. 83.1(d)

*Attorneys for Defendants Syngenta Crop
Protection AG, Syngenta Corporation,
and Syngenta Crop Protection, LLC*